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September 15, 2017

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Hon. Judge Sarah Netburn  
United States Courthouse  
40 Centre Street  
New York, NY 10007

**Case Name:** Breathe LLC et al v. White Fox Ventures, Inc. et al

**Case Number:** 1:17-cv-00367-VM

Dear Hon. Judge Netburn:

This office is counsel to the Plaintiffs in this matter. This Status Letter is prepared by counsel jointly. The deposition of the Plaintiffs and Mr. Shaw will occur on October 12, 2017. The deposition of White Fox Ventures, Inc. will occur on October 13, 2017 via video.

Plaintiff will be responding to White Fox Ventures, Inc. document request by September 21, 2017. Plaintiff also seeks to inform the court of the possibility of an expert in the securities field to address Plaintiff's claim associated with its inability to sell its shares of White Fox Ventures, Inc. stock.

In addition, the parties have discussed settlement but no resolution has been reached at this time.

Plaintiff will also be filing a Motion to Amend the Complaint to add causes of actions associated with the violation of federal securities laws.

By:



Christopher L. Brown

Cc: Ira Greenberg, Esq via email  
Seth Shaw, via email